

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

FERNANDO ARMENDARIZ

Plaintiffs,
v.

Civil Action No.: 1:22-cv-00536-JL-AJ

SIG SAUER, INC.

Defendant.

JOINT STIPULATED MOTION TO AMEND THE SCHEDULING ORDER

Defendant Sig Sauer, Inc. (“Defendant”) and all the Plaintiffs in this consolidated action (“Plaintiffs”) (collectively, the “Parties”), by and through their respective undersigned counsel, hereby submit the following Joint Stipulated Motion to Extend Deadlines.

PROCEDURAL HISTORY

1. The 77 plaintiffs in this consolidated lawsuit (including loss of consortium plaintiffs) have instituted claims including negligence and strict liability related to injuries allegedly sustained from the use of their Sig Sauer P320.
2. The first Complaint was filed on November 30, 2022, and the most recent Complaint was filed on June 27, 2024. [ECF Doc. 1] [ECF Doc. 72]
3. After filing a motion to dismiss, Defendant’s initial Answer was filed on August 11, 2023. [ECF Doc. 43]
4. Defendant’s most recent Answer was filed on July 18, 2024. [ECF Doc. 82]
5. On November 22, 2023, the Court entered a Scheduling Order that set a Fact Discovery Deadline of April 30, 2025, as well as various other deadlines. [ECF Doc. 49]

6. Written discovery for all of the plaintiffs proceeded throughout 2024. Defendant also responded to the Plaintiffs' written discovery demands during that time.

7. On September 27, 2024, the Parties filed a Joint Agreement on the Initial Selection Process for Bellwether Plaintiffs, which the Court endorsed on October 1, 2024. [ECF Doc. 86].

8. On December 9, 2024, the Court entered its Order selecting 11 bellwether plaintiffs. [ECF Doc. 87]

9. Since the selection of the bellwether plaintiffs, the parties have sought and obtained information about the subject incidents and the damages claimed by Plaintiffs, including medical records, via subpoenas, for the bellwether plaintiffs.

10. Additionally, counsel for both parties participated in another jury trial in July 2025, which consumed a significant amount of time.

11. The parties have conducted a number of depositions and are in the process of scheduling the depositions of the remaining bellwether plaintiffs, along with relevant fact witnesses, including responding police officers, emergency medical technicians and damages witnesses.

12. The Parties anticipate needing to complete the depositions of 75-100 witnesses across the 10 bellwether incidents, including the plaintiffs, as part of fact discovery. Additionally, Plaintiffs have requested the depositions of several representatives of Defendant.

13. Additionally, the Parties are working to schedule the examinations of the pistols at issue in each of the bellwether Plaintiffs' incidents, some of which require coordination with law enforcement agencies who own and have possession of the firearms.

14. On May 13, 2025, the court granted the Parties' joint motion to extend deadlines which pushed the deadline for completing fact discovery to October 27, 2025. Based on the amount of fact discovery that remains outstanding, the parties require an extension of these deadlines.

15. Based on the foregoing, the parties jointly request the remaining deadlines from the May 13, 2025, Scheduling Order be extended 120 days, with new scheduling deadlines as follows:

- Fact Discovery deadline: **February 24, 2026**
- Plaintiffs' Expert Disclosures: **April 28, 2026**
- Defendant's Expert Disclosures: **July 28, 2026**
- Expert Discovery Deadline: **September 26, 2026**
- Summary Judgment Deadline: **December 18, 2026**
- Expert Challenges: **December 18, 2026**
- Renewed Motions to Sever/Transfer: **January 29, 2027**

16. Granting the relief requested in this motion would likely require a continuance of the current trial date set by the Court to commence on March 2, 2027. *See* June 17, 2025 ECF Notice.

17. None of the parties will be unduly prejudiced by the granting of this motion.

CONCLUSION

Based upon the foregoing facts, reasons, and for any other grounds this Court deems just, the Parties respectfully propose extensions of the above deadlines.

Date: September 16, 2025

Respectfully submitted,
Fernando Armendariz, et al.,

Date: September 16, 2025

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) this day.

Date: September 16, 2025

By: /s/ David W. Johnston
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